

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION  
SERVICE CHANGES, 2011

Docket No. N2012-1

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO NATIONAL POSTAL MAIL HANDLERS UNION INTERROGATORY  
REDIRECTED FROM WITNESS DAVID WILLIAMS  
(NPMHU/USPS-T1-19)**

The United States Postal Service hereby files responses to the above-listed interrogatory of the National Postal Mail Handlers Union dated February 24, 2012. The interrogatory is stated verbatim and followed by the response. The interrogatory has been redirected from witness Williams to the Postal Service for an institutional response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Anthony F. Alverno, Jr.  
Chief Counsel, Global Business

Michael T. Tidwell

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2998; Fax -5402  
March 16, 2012

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO NATIONAL POSTAL MAIL HANDLERS UNION INTERROGATORY  
REDIRECTED FROM WITNESS DAVID WILLIAMS**

**NPMHU/ USPS-T1-19** Please explain the Postal Service's plans for updating or revising the information provided to the Postal Regulatory Commission regarding the anticipated cost savings and design of the future network, given the results of the decisions released on February 23, 2012. In your answer, please specify which specific testimony, library references, and interrogatory responses will be updated or revised, and provide specific dates or time frames in which such testimony or library references will be updated or revised.

**RESPONSE**

Please see USPS Library References N2012-1/73 and NP16 for the consolidation decisions which reflect the formulation of most of the future mail processing network that the Postal Service is planning to implement as early as the latter half of May 2012. Please also see the response to APWU/USPS-T1-26. Much work remains to be done in the forthcoming weeks to define many of the minute operational details; such work will continue throughout the planning and implementation of specific facility and operational consolidations. Initiation of the implementation of the February 23 consolidation decisions is also contingent upon the resolution of the ongoing service standard rulemaking.

As required by the Commission's rules, the Postal Service continuously reviews all aspects of its case to determine if updates or corrections are required because of new or previously unknown information. Fundamentally the decisions announced on February 23 do not alter the nature or direction of the mail processing network rationalization for which an advisory opinion has been requested.

**RESPONSE to NPMHU/USPS-T1-19 (continued)**

The service changes under review in this docket are being pursued because they will provide a basis for operational changes that allow for a significant reduction in excess mail processing capacity. That, in turn, will generate cost savings, that help stabilize the Postal Service financially for the long term, given continuing declines in volume and revenue while operating costs remain high. The request in this docket seeks an advisory opinion on whether pursuit of the proposed service changes, and consequent improved balance between costs and revenues, would for those reasons be consistent with applicable policies of title 39. Nothing contained in the announcements of February 23 changes or detracts from the aforementioned basic principles underlying the service changes. Inasmuch as the February 23 decisions do not alter the fundamental nature of the proposed service changes, the Postal Service does not currently anticipate any significant or fundamental updates or revisions to its direct case.